

Plaintiffs, Robert Thomas, Scott Patrick Harris, Michael Bell, Sandra Palumbo, Frank Karbarz, and Thomas Davis, on behalf of themselves and all others similarly situated (hereinafter referred to as “Plaintiffs”), and Defendant Lennox Industries Inc. (“Lennox”) respectfully move this Court for an extension of time up to and including June 26, 2015, for Plaintiffs to file a motion for preliminary approval of class settlement and to reset the preliminary approval hearing to July 9, 2015, or another time that is convenient for the Court’s schedule. In support thereof, the parties state as follows:

1. On April 16, 2015, the Court granted the Plaintiffs' agreed motion for an extension of time to file the motion for preliminary approval of the class settlement and to reset the preliminary approval hearing. The Plaintiffs were given until May 21, 2015 to file the motion for preliminary approval of the class settlement and the Court reset the preliminary approval hearing to May 28, 2015.

2. The parties requested additional time to file the motion for preliminary approval

of the class settlement, which the Court permitted and reset the preliminary approval hearing to June 18, 2015.

3. Since the filing of Plaintiffs' second agreed motion, the parties have worked diligently to prepare and execute a comprehensive class action settlement agreement. The parties, however, request an additional 15 days to finalize the Stipulation and Agreement of Settlement. Completion of this step is necessary before Plaintiffs are able to file a motion for preliminary approval of the class settlement.

4. This motion is made in good faith and not for purposes of delay.

WHEREFORE, the parties request that the Court grant this agreed motion and permit the parties an additional 15 days, or until June 26, 2015, for Plaintiffs to file their motion for preliminary approval of class settlement and reset the preliminary approval hearing to July 9, 2015, or another time that is convenient for the Court's schedule.

Dated: June 11, 2015

ROBERT THOMAS, et al.,
Class Representative Plaintiffs

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that the **Agreed Motion for an Extension of Time to File Motion for Preliminary Approval of Class Settlement and to Reset Preliminary Approval Hearing** was served on June 11, 2015 in accordance with FED. R. CIV. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

/s/ Norman K. Beck